



Cindy Cox

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February 3, 2015

Ms. Jocelyn Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Dr., Suite 100
Columbia, SC 29211

Re: Docket No. 2014-43-C: BellSouth Telecommunications, LLC d/b/a AT&T South Carolina
Filing – FCC WC Docket No. 11-42

Dear Ms. Boyd:

We are providing the following information in compliance with FCC requirements.¹ No Commission action is required.

On February 2, 2015, AT&T South Carolina submitted the attached Form 555 to the Federal Communications Commission and the Universal Service Administrative Committee.

By copy of this letter, I am providing a copy of this filing to the Office of Regulatory Staff.

Sincerely,

A handwritten signature in black ink, appearing to read "Cindy Cox", written in a cursive style.

cc: Nanette Edwards, ORS

¹ See Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 11-42, 27 F.C.C.R. 6656 (Rel. Feb. 6, 2012), Erratum Released May 16, 2012.



Anisa A. Latif
Associate Director
Federal Regulatory

AT&T Services, Inc.
1120 20th Street, N.W.,
Suite 1000
Washington, D.C. 20036

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February 2, 2015

Via Electronic Submission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby – TW-A325
Washington, D.C. 20554

**Re: AT&T Annual Lifeline Eligible Telecommunications Carrier Certification
Form – FCC Form 555
WC Docket No. 14-171**

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 54.416, AT&T Services, Inc., on behalf of its affiliates BellSouth Telecommunications, LLC,¹ Illinois Bell Telephone Company,² Indiana Bell Telephone Company,³ Michigan Bell Telephone Company,⁴ Nevada Bell Telephone Company,⁵ The Ohio Bell Telephone Company,⁶ Wisconsin Bell,⁷ and Southwestern Bell Telephone Company⁸ hereby submits its 2015 Annual Lifeline Eligible Telecommunications Carrier Certification Form via the Commission's Electronic Comment Filing System. As required, AT&T also submitted its filing to the Universal Service Administrative Company.

Should you have any questions, feel free to contact me.

Sincerely,

/s/ Anisa A. Latif
Anisa A. Latif

Attachment

¹ SAC Nos. 255181, 215191, 225192, 265182, 275183, 285184, 235193, 245194, and 295185.

² SAC No. 345070.

³ SAC No. 325080.

⁴ SAC No. 315090.

⁵ SAC No. 555173.

⁶ SAC No. 305150.

⁷ SAC No. 335020.

⁸ SAC Nos. 405211, 415214, 425213 and 435215.



Paul Stephens – Sr.VP & Controller
AT&T
208 S. Akard St. Suite 3805
Dallas, TX 75202

February 2, 2015

Marlene Dortch
Secretary
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

**Re: *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42;
Copies of FCC Forms 555 for BellSouth Telecommunications, LLC; Illinois
Bell Telephone Company; Indiana Bell Telephone Company, Inc.; Michigan
Bell Telephone Company; Nevada Bell Telephone Company; Southwestern
Bell Telephone Company; The Ohio Bell Telephone Company; and
Wisconsin Bell, Inc.**

Dear Ms. Dortch:

Please find enclosed the 2015 FCC Forms 555 for the following affiliates of AT&T Services, Inc. ("AT&T") that are eligible telecommunications carriers ("ETCs"): BellSouth Telecommunications, LLC ("BellSouth");¹ Illinois Bell Telephone Company ("AT&T Illinois"); Indiana Bell Telephone Company, Inc. ("AT&T Indiana"); Michigan Bell Telephone Company ("AT&T Michigan"); Nevada Bell Telephone Company ("AT&T Nevada"); Southwestern Bell Telephone Company ("Southwestern Bell");² The Ohio Bell Telephone Company ("AT&T Ohio"); and Wisconsin Bell, Inc. ("AT&T Wisconsin").³

The 2015 FCC Form 555 requires ETCs to report the number of subscribers claimed on their February 2014 FCC Form 497, among other data elements. As AT&T's affiliated ETCs explained previously, they commenced an internal review of their Lifeline subscriber base last year.⁴ During the course of that review, they reviewed Lifeline subscriber documentation. At

¹ BellSouth does business in nine states under a different name, as follows: AT&T Alabama, AT&T Florida, AT&T Georgia, AT&T Kentucky, AT&T Louisiana, AT&T Mississippi, AT&T North Carolina, AT&T South Carolina, and AT&T Tennessee.

² Southwestern Bell does business in four states under a different name as follows: AT&T Arkansas, AT&T Kansas, AT&T Missouri, and AT&T Oklahoma. Southwestern Bell also does business in Texas as AT&T Texas but AT&T is separately filing with the Commission the FCC Form 555 for AT&T Texas.

³ This letter will refer to AT&T Illinois, AT&T Indiana, AT&T Michigan, AT&T Ohio, and AT&T Wisconsin collectively as "AT&T Midwest."

⁴ See, e.g., <http://apps.fcc.gov/ecfs/document/view?id=7521102936>.



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that time, several of AT&T's affiliated ETCs identified a small fraction of subscribers for which they were not able to confirm that they had complete or current certifications of eligibility.⁵ These affiliates continued their review of Lifeline subscriber documentation in 2014. Specifically, based on the results of their analysis of new Lifeline customers enrolled in February 2014 and their historical analysis, AT&T's affiliated ETCs identified a weighted average error rate out of a statistically valid sample, with a 95% confidence level that the weighted average error rate in the total population would be between 0.63% and 1.78% for BellSouth, 0.10% and 0.37% for AT&T Midwest; 0.13% and 2.03% for AT&T Nevada; and 0.15% and 0.61% for Southwestern Bell. As a result of this review, AT&T's affiliated ETCs reduced the number of retail subscribers for whom they sought Lifeline reimbursement through their February 2014 FCC Forms 497 by the high end of their specific range. For this reason, the numbers reported in Block F and Block K of the FCC Form 555 do not equal the numbers reported in Block E.

It was AT&T's affiliated ETCs' preference to provide the explanation in the preceding paragraph on the FCC Form 555 itself. However, based on discussions between the ETCs' representatives and USAC last year, I understand that USAC will not accept FCC- and OMB-approved forms that have been modified in any way by third parties without written approval from the Commission and, instead, USAC indicated that AT&T's affiliated ETCs could provide this information in a cover letter. I further understand that the ETCs' representatives were not successful last year in their efforts to have the Commission provide USAC such written approval so that the ETCs could provide the information about their *de minimis* error rates and their decision to seek less reimbursement on the FCC Form 555 itself but that Commission staff had no objection to AT&T's affiliated ETCs providing the information in a cover letter. Consequently, AT&T's affiliated ETCs again provide this information in a cover letter.

Please do not hesitate to contact me immediately if you have any questions about the information provided in this cover letter or if you desire any further information.

Very truly yours,

Paul W. Stephens
Senior Vice President & Controller

Attachments

⁵ *Id.*

Annual Lifeline Eligible Telecommunications Carrier Certification Form
All carriers must complete all or portions of all sections
Form must be submitted to USAC and filed with the Federal Communications Commission
IMPORTANT: PLEASE READ INSTRUCTIONS FIRST
Deadline: January 31st (Annually)

245194

Study Area Code (SAC)

(An Eligible Telecommunications Carrier (ETC) must provide a certification form for **each** SAC through which it provides Lifeline service).

South Carolina

State

BellSouth Telecommunications, LLC

ETC Name

AT&T South Carolina

DBA, Marketing or Other Branding Name

(If same as ETC name, list "N/A" Do not leave blank)

AT&T Inc.

Holding Company Name

(If same as ETC name, list "N/A" Do not leave blank)

Does the reporting company have affiliated ETCs?

Yes ☒

No ☐

Provide a list of all ETCs that are affiliated with the reporting ETC, using page 4 and additional sheets if necessary. Affiliation shall be determined in accordance with Section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.

Affiliated ETC's SAC	Affiliated ETC's Name
See page 4.	See page 4.

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate bylaws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

Section 1: Initial Certification All ETCs must complete this section

I certify that the company listed above has certification procedures in place to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

Initial RS

Section 2: Annual Recertification

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

A	B	C	D	E = (A - B - C - D)
Number of subscribers claimed on February FCC Form 497 of current Form 555 calendar year (February data month)	Number of lines claimed on February FCC Form 497 of current Form 555 calendar year provided to wireline resellers	Number of subscribers claimed on the February FCC Form 497 that were <u>initially</u> enrolled in the current Form 555 calendar year (These subscribers did not have Lifeline service prior to January 1 of the current 555 calendar year.)	Number of subscribers de-enrolled prior to recertification attempt by either the ETC, a state administrator, access to an eligibility database, or by USAC	Number of subscribers ETC is responsible for recertifying for current Form 555 calendar year
11,499	6,817	44	681	3,957

Recertification Results:

F	G	H = (F-G)	I	J = (H+I)
Number of subscribers ETC contacted directly to recertify eligibility through attestation	Number of subscribers responding to ETC contact	Number of non-responding subscribers	Number of subscribers responding that they are no longer eligible (This should be a subset of Block G.)	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or response of ineligibility from ETC recertification attempt
4,042	2,334	1,708	Not Available	1,708

K	L
Number of subscribers whose eligibility was reviewed by state administrator, ETC access to eligibility database, or by USAC	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of finding of ineligibility by state administrator, ETC access to eligibility database, or USAC
0	0

Note: If any subscriber was reviewed by an ETC accessing a state database or by a state administrator and subsequently contacted directly by the ETC in an attempt to recertify eligibility, those subscribers should be listed in Blocks F through J as appropriate and not in Blocks K and L. As a result, all subscribers subject to recertification who were not de-enrolled prior to the recertification attempt must be accounted for in Block F or Block K.

The total of Block F and Block K should equal the number reported in Block E.

Certification:

Based on the data entered above, initial the certification(s) below that apply. Both Certification A and B may apply depending on the recertification procedures in place for the SAC reporting on this form. If Certification C applies, neither Certification A nor B may apply.

A.) I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. Results are provided in the chart above in Blocks F through J. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above. Initial

AND/OR

B.) I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on: (List database or name of administrator here). Results are provided in the chart above in Blocks K through L. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above. Initial

OR

C.) I certify that my company did not claim federal low income support for any Lifeline subscribers for the February Form 497 data month for the current Form 555 calendar year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above. Initial

Section 3: De-enroll Percentage

Using the data entered in Section 2, complete the chart below to find the percentage of subscribers de-enrolled for this ETC.

$M = (F+K)$	$N = (J+L)$	$O = ((N + M) * 100)$
Number of subscribers that the ETC attempted to recertify directly or through a state administrator, ETC access to a state database, or by USAC (This should equal the number reported in Block E)	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or ineligibility	Percentage of subscribers de-enrolled or scheduled to be de-enrolled as a result of ineligibility or non-response
4,042	1,708	42.3

Section 4: Pre-Paid ETCs

All ETCs must complete the appropriate check-box; pre-paid ETCs must complete all of Section 4. Pre-paid ETCs generally do not assess or collect a monthly fee from their Lifeline subscribers. ETCs that only assess a fee but do not collect such fees are pre-paid ETCs and must complete the chart below.

Is the ETC Pre-Paid?

Yes ☐

No ☒

If Yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

P	Q
Month	Subscribers De-Enrolled for Non-Usage
January	
February	
March	
April	
May	
June	
July	
August	
September	
October	
November	
December	
Total Subscribers	

Signature Block

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Signed, _____

Signature of Officer

ps0278@att.com

Email Address of Officer

Ronald L. Hilver

Person Completing This Certification Form

Paul W. Stephens, Senior Vice President & Controller
Printed Name and Title of Officer

2/2/15
Date

404-927-8120

Contact Phone Number

Affiliated ETCs

SAC	Name
549004	AT&T CORP
639005	AT&T MOBILITY PUERTO RICO, INC.
259908	AT&T MOBILITY, LLC
399015	AT&T MOBILITY, LLC
529910	AT&T MOBILITY, LLC
539010	AT&T MOBILITY, LLC
215191	AT&T MOBILITY, LLC
225192	BELLSOUTH TELECOMMUNICATIONS, LLC
235193	BELLSOUTH TELECOMMUNICATIONS, LLC
255181	BELLSOUTH TELECOMMUNICATIONS, LLC
265182	BELLSOUTH TELECOMMUNICATIONS, LLC
275183	BELLSOUTH TELECOMMUNICATIONS, LLC
285184	BELLSOUTH TELECOMMUNICATIONS, LLC
295185	BELLSOUTH TELECOMMUNICATIONS, LLC
409034	BELLSOUTH TELECOMMUNICATIONS, LLC
459009	CRICKET COMMUNICATIONS, INC.
549009	CRICKET COMMUNICATIONS, INC.
469012	CRICKET COMMUNICATIONS, INC.
579006	CRICKET COMMUNICATIONS, INC.
229023	CRICKET COMMUNICATIONS, INC.
479014	CRICKET COMMUNICATIONS, INC.
349028	CRICKET COMMUNICATIONS, INC.
329017	CRICKET COMMUNICATIONS, INC.
419025	CRICKET COMMUNICATIONS, INC.
269035	CRICKET COMMUNICATIONS, INC.
189008	CRICKET COMMUNICATIONS, INC.
429012	CRICKET COMMUNICATIONS, INC.
239027	CRICKET COMMUNICATIONS, INC.
379024	CRICKET COMMUNICATIONS, INC.
499014	CRICKET COMMUNICATIONS, INC.
559014	CRICKET COMMUNICATIONS, INC.
159025	CRICKET COMMUNICATIONS, INC.
309011	CRICKET COMMUNICATIONS, INC.
439053	CRICKET COMMUNICATIONS, INC.
539009	CRICKET COMMUNICATIONS, INC.
179017	CRICKET COMMUNICATIONS, INC.
249001	CRICKET COMMUNICATIONS, INC.
299024	CRICKET COMMUNICATIONS, INC.
449065	CRICKET COMMUNICATIONS, INC.
509008	CRICKET COMMUNICATIONS, INC.
199017	CRICKET COMMUNICATIONS, INC.
529017	CRICKET COMMUNICATIONS, INC.
339035	CRICKET COMMUNICATIONS, INC.
345070	CRICKET COMMUNICATIONS, INC.
325080	ILLINOIS BELL TELEPHONE COMPANY
315090	INDIANA BELL TELEPHONE COMPANY, INC.
555173	MICHIGAN BELL TELEPHONE COMPANY
209012	NEVADA BELL TELEPHONE COMPANY
269905	NEW CINGULAR WIRELESS PCS, LLC
279010	NEW CINGULAR WIRELESS PCS, LLC
	NEW CINGULAR WIRELESS PCS, LLC

Affiliated ETCs

SAC	Name
289912	NEW CINGULAR WIRELESS PCS, LLC
319026	NEW CINGULAR WIRELESS PCS, LLC
389015	NEW CINGULAR WIRELESS PCS, LLC
409004	NEW CINGULAR WIRELESS PCS, LLC
449022	NEW CINGULAR WIRELESS PCS, LLC
479006	NEW CINGULAR WIRELESS PCS, LLC
619004	NEW CINGULAR WIRELESS PCS, LLC
545170	PACIFIC BELL TELEPHONE COMPANY
405211	SOUTHWESTERN BELL TELEPHONE COMPANY
415214	SOUTHWESTERN BELL TELEPHONE COMPANY
425213	SOUTHWESTERN BELL TELEPHONE COMPANY
435215	SOUTHWESTERN BELL TELEPHONE COMPANY
445216	SOUTHWESTERN BELL TELEPHONE COMPANY
305150	THE OHIO BELL TELEPHONE COMPANY
335220	WISCONSIN BELL, INC.